### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

Defendants.

# PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL

Plaintiffs respectfully move the Court for an order certifying the Class as described in the accompanying memorandum of law, and appointing the proposed Class Representatives and Class Counsel as set forth in the memorandum.

WHEREFORE, as more fully discussed in the accompanying Memorandum of Law and the Declaration of Edward J. Normand and the attached exhibits in support of this Motion, Plaintiffs respectfully request that this Court: (a) certify the Class defined herein; (b) appoint Freedman Normand Friedland LLP, Gilbert Litigators & Counselors, P.C., and Berger Montague

PC as Co-Lead Class Counsel; and (c) grant all other just relief.

Dated: December 16, 2024

/s/ Robert D. Gilbert Robert D. Gilbert

Elpidio Villarreal

Robert S. Raymar

David S. Copeland

Natasha Zaslove

## GILBERT LITIGATORS & COUNSELORS, PC

11 Broadway, Suite 615

New York, NY 10004

Tel: (646) 448-5269

rgilbert@gilbertlitigators.com

pdvillarreal@gilbertlitigators.com

rraymar@gilbertlitigators.com

dcopeland@gilbertlitigators.com

nzaslove@gilberlitigators.com

#### /s/ Eric L. Cramer

Eric L. Cramer

Ellen T. Noteware

David Langer

Jeremy Gradwohl

#### **BERGER MONTAGUE PC**

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-3000

ecramer@bm.net

enoteware@bm.net

dlanger@bm.net

igradwohl@bm.net

Richard Schwartz

#### **BERGER MONTAGUE PC**

1720 W Division

C1: W DIVISION

Chicago, IL 60622

Tel: (773) 257-0255

rschwartz@bm.net

Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman

Edward J. Normand

Richard Cipolla

Joseph Delich

Joseph Dench

Peter Bach-y-Rita

## FREEDMAN NORMAND FRIEDLAND LLP

155 E. 44th Street, Suite 915

New York, NY 10017

Tel: (646) 350-0527

vel@fnf.law

tnormand@fnf.law

rcipolla@fnf.law

jdelich@fnf.law

pbachyrita@fnf.law

Ivy Ngo

## FREEDMAN NORMAND FRIEDLAND LLP

1 SE 3d Avenue, Suite 1240

Miami, FL 33131

Tel: (786) 924-2900

ingo@fnf.law

Daniel J. Walker

Robert E. Litan

Hope Brinn

#### **BERGER MONTAGUE PC**

1001 G Street, NW, Suite 400 East

Washington, DC 20001

Tel: (202) 559-9745

rlitan@bm.net

dwalker@bm.net

hbrinn@bm.net

Counsel for Plaintiffs